

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

JERRY MCKINNEY

NO. 1:19-CV-01339-DDD-JPM

V.

**RAPIDES PARISH SHERIFF'S OFFICE AND
SHERIFF WILLIAM EARL HILTON**

**MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

NOW INTO COURT, through undersigned counsel, comes defendant, Sheriff William Earl Hilton, who moves for an extension of time to respond to plaintiff's Motion for Summary Judgment. For the reasons more fully set forth in the accompanying memorandum, plaintiff's deposition set for Thursday was cancelled due to Hurricane Laura; the dispositive Motion deadline is February of 2021 and discovery is still pending.

Respectfully submitted:
S/Timothy Richardson
Timothy Richardson (27625)
Usry & Weeks
1615 Poydras Street, Ste 1250
New Orleans, La 70112
(504) 592 4600
Fax: (504) 592 4641

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served on all counsel of record this 1st day of September 2020.

S/Timothy Richardson